## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

HUAWEI TECHNOLOGIES CO. LTD.

Plaintiff,

v.

T-MOBILE US, INC. and T-MOBILE USA, INC.,

Defendants,

NOKIA SOLUTIONS AND NETWORKS US LLC and NOKIA SOLUTIONS AND NETWORKS OY,

Intervenors.

CIVIL ACTION NO. 2:16-cv-56-JRG-RSP

JURY TRIAL DEMANDED

## **NOTICE OF COMPLIANCE**

Defendants T-Mobile US, Inc. and T-Mobile USA, Inc. (collectively "T-Mobile") and Intervenors Nokia Solutions and Networks US LLC and Nokia Solutions and Networks Oy (collectively "NSN") hereby notify the Court that on November 17, 2016, pursuant to P.R. 4-2 and the Court's Docket Control Order (2:16-cv-56-JRG-RSP, Dkt. No. 81), T-Mobile and NSN served upon opposing counsel a preliminary proposed construction of each claim term, phrase, or clause which the parties collectively have identified for claim construction purposes, along with a preliminary identification of extrinsic evidence supporting each proposed construction. This includes, for each element that any party contends is governed by 35 U.S.C. § 112(6), a preliminary identification of the structure(s), act(s), or material(s) corresponding to that element.

#### Respectfully submitted,

Dated: November 17, 2016

### /s/ Mark D. Selwyn (with permission)

Mark D. Selwyn

(California Bar No. 244180)

Kathryn D. Zalewski

(California Bar No. 263119)

WILMER CUTLER PICKERING HALE

AND DORR LLP

950 Page Mill Road

Palo Alto, California 94304

Tel. 650-858-6000

Joseph J. Mueller

(Massachusetts Bar No. 647567)

Cynthia Vreeland

(Texas Bar No. 20625150

Massachusetts Bar No. 635143)

WILMER CUTLER PICKERING HALE

AND DORR LLP

60 State Street

Boston, MA 02109

Tel. 617-526-6000

Michael E. Jones

SBN: 10929400

POTTER MINTON, PC

110 North College, Suite 500

Tyler, Texas 75702

Tel. 903-597-8311

Fax 903-593-0846

Email: mikejones@potterminton.com

Attorneys for Defendants T-Mobile US, Inc. and T-Mobile USA, Inc.

#### /s/ John Haynes

John Haynes (GA Bar No. 340599)

Patrick Flinn (GA Bar No. 264540)

Michael C. Deane (GA Bar No. 498195)

Nicholas Tsui (GA Bar No. 982502)

ALSTON & BIRD LLP

1201 W. Peachtree St.

Atlanta, GA 30309-3424

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

Email: Patrick.Flinn@alston.com
Email: John.Haynes@alston.com
Email: Michael.Deane@alston.com
Email: Nick.Tsui@alston.com

Michael J. Newton (TX Bar No. 24003844) Derek Neilson (TX Bar No. 24072255) ALSTON & BIRD LLP 2800 N. Harwood St., Suite 1800 Dallas, Texas 75201 Telephone: (214) 922-3400

Facsimile: (214) 922-3899

Email: Mike Newton@alston.c

Email: Mike.Newton@alston.com Email: Derek.Neilson@alston.com

M. Scott Stevens (NC Bar No. 37828)
Ross R. Barton (NC Bar No. 37179)
Linda Chang (NC Bar No. 44290)
Robert Caison (NC Bar No. 46632)
Samuel Merritt (NC Bar No. 47945)
M. Joseph Fernando (NC Bar No. 49199)
ALSTON & BIRD LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Telephone: (704) 444-1000
Facsimile: (704) 444-1111
Email: Scott.Stevens@alston.com
Email: Ross Barton@alston.com

Email: Scott.Stevens@alston.com
Email: Ross.Barton@alston.com
Email: Linda.Chang@alston.com
Email: Robert.Caison@alston.com
Email: Sam.Merritt@alston.com
Email: Ravi.Fernando@alston.com

Marsha E. Diedrich (CA Bar No. 93709) ALSTON & BIRD LLP 333 South Hope Street 16th Floor Los Angeles, CA 90071 Telephone: (213) 576-1000

Telephone: (213) 576-1000 Facsimile: (213) 576-1100

Email: Marsha.Diedrich@alston.com

Thomas Davison (FL Bar No. 55687) ALSTON & BIRD LLP The Atlantic Building 950 F Street, NW Washington, DC 20004-1404 Telephone: (202) 239-3300 Facsimile: (202) 239-3333

Email: Tom.Davison@alston.com

Deron R. Dacus Texas State Bar No. 790553 THE DACUS FIRM, P.C. 821 ESE Loop 323, Suite 430 Tyler, TX 75701

Telephone: (903) 705-1117 Facsimile: (903) 581-2543 Email: ddacus@dacusfirm.com

Counsel for Intervenors Nokia Solutions and Networks US LLC and Nokia Solutions and Networks Oy.

# **CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2016, a true and correct copy of the foregoing document was served upon all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ John Haynes
John Haynes